EPSTEIN BECKER & GREEN, P.C. One Gateway Center, 13th Floor Newark, New Jersey 07102 (973) 642-1900 Attorneys for Defendants

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

: Civil Action No.: 14-cv-556-JAP-DEA

WAYNE A. PHILP,

Plaintiff,

Document Electronically Filed

V.

ROSS UNIVERSITY SCHOOL OF MEDICINE (RUSM), DR. JORGE C. RIOS, DR. MARY T. COLEMAN, DR. HARRIET H. MEYERS, DR. RAYMOND ADEBIYI, DR. THOMAS C. SHEPHERD

Defendants.

NOTICE OF MOTION

TO: Wayne Philip, Pro Se 9984 Twin Lakes Drive Coral Springs, FL 33071

PLEASE TAKE NOTICE that, on June 16, 2014, at 10:00 a.m., or as soon thereafter as counsel may be heard, defendants Ross University School of Medicine, Dr. Jorge C. Rios, Dr. Mary T. Coleman, Dr. Harriet H. Meyers, Dr. Raymond Adebiyi and Dr. Thomas C. Shepherd ("Defendants") shall move before the Honorable Joel A. Pisano, U.S.D.J., at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an order dismissing the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6); and

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants shall rely upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint and the Declaration of Robert M. Travisano, Esq., with annexed exhibits.

PLEASE TAKE FURTHER NOTICE that Defendants have also submitted a proposed form of order, and requests oral argument if the Court would consider such argument helpful in resolving the issues presented.

Dated: May 16, 2014 Respectfully submitted,

EPSTEIN, BECKER & GREEN, P.C. Attorneys for Defendants

By: /s/

WILLIAM S. GYVES ROBERT M. TRAVISANO

One Gateway Center, 13th Floor Newark, New Jersey 07102 (973) 642-1900

Email: wgyves@ebglaw.com

rtravisano@ebglaw.com